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February 14, 2005

Katrina Springer
Campaign Finance Analyst
Reports Analysis Division
Federal Election Commission
999 E Street, NW
Washington, DC 20463

MAILED AND
FAXED 202-219-3496

RECEIVED
FEB 14 2005
OPERATIONS CENTER
703 FEB 18 A 8:56

ID No C00040741

Dear Katrina:

We are writing in response to recent communications received which question certain filings. In regard to your communication dated January 26, 2005 (Year End Report (11/23/04-1231-04) regarding the 24 hour notice filed for the Fingerhut Powers and Smith disbursement for 10/23/04. I consulted you on this disbursement and tried to file it on 10/22/04, when I was on the phone with you to get the expenditure filed within 24 hour period. It was your software that would not allow me to file this expenditure the day before the ads were to be aired, so since the ads aired on Saturday, I was not able to do this filing prior to the ads being run because it was an anomaly of the software that would not accept this filing prior to the actual date. So, since your reporting software is on only one computer in our office, I was forced to go to the office on Sunday October 24, 2004 to file this report. Unfortunately when I did go to the office on Sunday and re-did the filing for the second time as instructed, I made a typographical error on the date of the check. Although the software would not allow me to do the filing prior to the date the ads would run, it allowed me to submit a date on the check of 11/23/04 that was not within the parameters of the 24 hour filing. This is apparently a flaw in the software as well as the error messages that appeared when I tried to do the filing correctly on Friday. Your software also indicates pass/fail errors and you told me to ignore warnings because the filing would only fail if there were errors. When I filed this report on Sunday your software should have not accepted it and given me an error which would have failed the filing when the check date was clearly out of the range of the 24 hour filing.

Katrina Springer, FEC
February 14, 2005

When Barbara Elliott returned from vacation the following week, the error was detected and your software would not allow us to amend the filing because we received an error that the time was past for filing a 24 hour report. We could not find a way to correct the

date of the check on the filing and there was no way to amend the report, so we filed an amendment with the report due for the period 10-14 through 11-22. This was marked amended with the correct date.

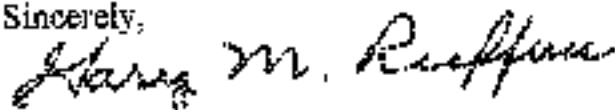
In regard to your letter dated October 20, 2004, regarding the October Quarterly report, for disbursements totaling \$14,258.35, we amended our 10/14-11/22 report in response to this correspondence. The expenditures should have been listed as an independent expenditure as our amended report reflects. We believe that this was communicated to you by phone and did not think there would be any written correspondence needed.

In regard to your correspondence dated January 21, 2005 regarding the Amended 12 day pre-general report, we did not think that we would fall into 48 hour reporting by amending and correcting our report since all the reports appear to use the actual date of the expenditure and the software did not notify us that amending our report would trigger 48 hour reporting. This appears to be another anomaly or flaw in the filing software that should prompt an error and not allow the report to be filed if the 48 hour report has not been filed.

We have tried to comply with all of the FEC reporting requirements and have only made the mistake of trying to complete these filings without taking up all of your time walking us through each filing. Please accept our apologies for any mistakes, which in no way were any attempt to avoid any reporting requirements. Routine reports for disbursements have never been a problem for us in the past and we thought we were in compliance by correcting and amending our reports as adequate response. Please let us know if you need any further explanations for these disbursements or the amended filings.

Thank You for your assistance in these matters,


Sincerely,



Gary M. Ruffner
National Secretary-Treasurer

Federal Election Commission
**ENVELOPE REPLACEMENT PAGE
 FOR INCOMING DOCUMENTS**

The FEC added this page to the end of this filing to indicate how it was received.

<input type="checkbox"/> Hand Delivered	Date of Receipt
<input checked="" type="checkbox"/> USPS First Class Mail	Postmarked 2-14-05
<input type="checkbox"/> USPS Registered/Certified	Postmarked (R/C)
<input type="checkbox"/> USPS Priority Mail	Postmarked
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<input type="checkbox"/> No Postmark	
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<input type="checkbox"/> Received from House Records & Registration Office	Date of Receipt
<input type="checkbox"/> Received from Senate Public Records Office	Date of Receipt
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<input type="checkbox"/> Other (Specify):	Date of Receipt or Postmarked
 PREPARER (5/2004)	2-18-05 DATE PREPARED